

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Implementation of the Local Competition)
Provisions in the Telecommunications Act)
of 1996)

CC Docket No. 96-98

Interconnection between Local Exchange)
Carriers and Commercial Mobile Radio)
Service Providers)

CC Docket No. 95-185 ✓

MOTION FOR ENLARGEMENT OF PAGE LIMIT

The Local Exchange Carrier Coalition ("LECC") respectfully requests that the Commission waive the 10-page limitation of Section 1.429(g) of its Rules for replies to oppositions filed in response to petitions for reconsideration of the First Report and Order (the "First Order") in the above-captioned proceeding.^{1/} LECC requests the Commission to enlarge the page limit to 20 double-spaced pages for replies to such oppositions. LECC also requests that the Commission clarify that empirical economic studies and copies of relevant state orders will not be counted against the page limit established by the Commission.

LECC consists of incumbent local exchange carriers ("LECs") that provide telecommunications services to residential and business customers in rural, urban, and

^{1/} See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 96-325 (rel. Aug. 8, 1996).

suburban areas throughout the United States. LECC filed a petition for reconsideration and clarification of the First Order on September 30, 1996.^{2/}

The requested enlargement of the page limit for replies is necessary for LECC to address fully the oppositions filed in this reconsideration proceeding. The Common Carrier Bureau has already increased the 25-page limits for petitions for reconsideration as well as oppositions to 50 double-spaced pages.^{3/} In doing so, the Bureau noted that the length of the First Order and the complexity of the issues presented "may require greater discussion than the typical Commission order."^{4/} Parties confirmed this conclusion by addressing at length in their petitions and oppositions numerous complex issues raised by the First Order. As a matter of procedural fairness, the requested enlargement of the page limit for replies is consistent with the preceding enlargements.

An increased page limit for replies will serve the public interest by ensuring that parties have the opportunity to compile a complete record in the Commission's reconsideration of the First Order. At least 35 parties have filed oppositions to or comments on the petitions, and most of these discuss important issues raised in LECC's petition, including transport and termination, network unbundling, collocation, pricing, resale obligations, reciprocal compensation, and attachments to poles, conduits, and rights of way. The implementation of Sections 251 and 252 of the Telecommunications Act of 1996 will have major and unique impacts on end users as well as the telecommunications industry.

^{2/} The members of LECC are listed in Attachment A to the LECC petition.

^{3/} See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Order, CC Docket No. 96-98, DA 96-1603 (Com. Car. Bur. rel. Sept. 24, 1996) (enlarging page limit for petitions for reconsideration); Order, CC Docket No. 96-98, DA 96-1764 (Com. Car. Bur. rel. Oct. 25, 1996) (enlarging page limit for oppositions).

^{4/} Id. at para. 2.

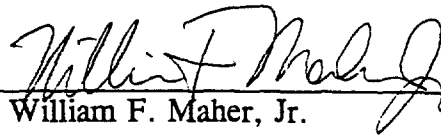
Accordingly, there is good cause for enlarging the page limit for replies in these circumstances.

WHEREFORE, LECC respectfully requests that the Commission waive Section 1.429(g) of its Rules and enlarge the page limit for replies to 20 double-spaced pages, while clarifying that empirical economic studies and copies of relevant state orders will not be counted against the page limit established by the Commission.

Respectfully submitted,

The Local Exchange Carrier Coalition

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November 4, 1996

CERTIFICATE OF SERVICE

I, Carmen Santana-Lee, a secretary at the law firm of Halprin, Temple, Goodman & Sugrue, do hereby declare that I have caused copies of the Motion for Enlargement of Page Limit of the Local Exchange Carrier Coalition ("LECC"), to be hand delivered this 4th day of November, 1996 to:

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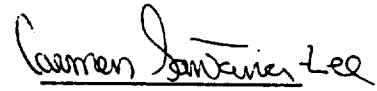
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